

BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

Presentment Date: November 4, 2014
Time: 12:00 p.m.

Objections Due: November 4, 2014
Time: 11:00 a.m.

*Attorneys for Irving H. Picard, Esq., Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF PRESENTMENT OF APPLICATION FOR AN ORDER APPROVING THE
RETENTION OF SPIZZ COHEN & SERCHUK, P.C. AS SPECIAL COUNSEL
NUNC PRO TUNC AS OF OCTOBER 1, 2014**

PLEASE TAKE NOTICE that upon the annexed application (the “Application”) of Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, for entry of an order approving the retention of Spizz Cohen & Serchuk, P.C. as special counsel to the Trustee as of

October 1, 2014, the undersigned will present a proposed order in substantially the form annexed to the Application (the “Order”) to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature and entry on **November 4, 2014 at 12:00 noon**.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Application (“Objections”), shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefore; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein, One Bowling Green, New York, New York 10004; and (v) be served upon (a) Baker & Hostetler LLP, Counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Nicholas J. Cremona, Esq., and (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, Esq., so as to be received no later than **11:00 a.m. on November 4, 2014**.

PLEASE TAKE FURTHER NOTICE, that in the event any Objections are timely served and filed, a hearing may be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE, that, unless Objections are timely served and filed, the proposed Order may be signed without a hearing.

Dated: New York, New York
October 27, 2014

Respectfully submitted,

/s/ Nicholas J. Cremona

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New York, New York 10111
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the Estate of Bernard L. Madoff*